

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

IMPLICIT, LLC,	)	
	)	Case No. 2:18-cv-53-JRG
Plaintiff,	)	LEAD CASE
	)	
v.	)	Case No. 2:18-cv-47-JRG
	)	MEMBER CASE
NETSCOUT SYSTEMS, INC.	)	
	)	Case No. 2:18-cv-54-JRG
Defendants.	)	MEMBER CASE

**NOTICE OF COMPLIANCE REGARDING  
DEFENDANTS' INVALIDITY CONTENTIONS**

Pursuant to the Rules of Practice for Patent Cases for the Eastern District of Texas (“Local Patent Rules” or “P.R.”), Defendants Sophos Ltd (“Sophos”), NetScout Systems, Inc. (“NetScout”) and Sandvine Corporation (“Sandvine”) (collectively “Defendants”) provide notice that on August 31, 2018, they jointly served their Invalidity Contentions upon Plaintiff’s counsel of record via electronic mail.

Dated: September 2, 2018

Respectfully submitted,

/s/ Jennifer Parker Ainsworth

Jennifer P. Ainsworth

(Texas Bar Card #00784720)

Matthew T. Milam

(Texas Bar Card #24065746)

**WILSON, ROBERTSON &  
CORNELIUS, P.C.**

909 ESE Loop 323, Suite 400

Tyler, Texas 75701

Tel.: 903-509-5000

Fax: 903-509-5092

*jainsworth@wilsonlawfirm.com*

*mmilam@wilsonlawfirm.com*

Douglas J. Kline (BBO #556680)

Lana S. Shiferman (BBO #645024)

Robert Frederickson (BBO

#670111)

**GOODWIN PROCTER LLP**

100 Northern Avenue

Boston, MA 02210

Tel.: 617-570-1000

Fax: 617-523-1231

*dkline@goodwinlaw.com*

*lshiferman@goodwinlaw.com*

*rfrederickson@goodwinlaw.com*

Counsel for Sophos Ltd.

/s/ Mark C. Lang

(with permission by Jennifer P. Ainsworth)

Abran J. Kean (CO Bar 44660)

**ERISE IP, P.A.**

5600 Greenwood Plaza Blvd., Suite 200

Greenwood Village, CO 80111

Telephone: (913) 777-5600

Eric A. Buresh (KS Bar 19895)

Mark C. Lang (KS Bar 26185)

**ERISE IP, P.A.**

7015 College Blvd., Suite 700

Overland Park, Kansas 66211

Telephone: (913) 777-5600

Facsimile: (913) 777-5601

eric.buresh@eriseip.com  
abran.kean@eriseip.com  
mark.lang@eriseip.com

Melissa Smith  
Texas State Bar No. 24001351  
melissa@gillamsmithlaw.com  
**GILLAM & SMITH, L.L.P.**  
303 South Washington Avenue  
Marshall, Texas 75670  
Telephone: 903-934-8450  
Facsimile: 903-934-9257

Counsel for Defendants NetScout Systems,  
Inc. and Sandvine Corporation

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system this 2nd day of September, 2018.

/s/ Jennifer P. Ainsworth  
Jennifer P. Ainsworth